

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ADAN YUSUF IBRAHIM,

Plaintiff,

v.

DRAKE, Corrections Officer Sergeant;  
EDMOND, Corrections Officer; PORTER,  
Corrections Officer; BATCHILY, Corrections  
Officer; MENDOZA, Corrections Officer;  
VELASQUES, Corrections Officer,

Defendants.

No. 2:23-cv-01755-BHS-TLF

STIPULATED MOTION AND  
ORDER FOR RELIEF FROM A  
DEADLINE

NOTED ON MOTION CALENDAR:  
March 14, 2025

**STIPULATION**

Plaintiff Adan Yusuf Ibrahim respectfully seeks an extension of seven days, to March 28, 2025, to file his response to the Court's Order to Show Cause, Dkt. No. 65.

The parties, by and through their counsel, have agreed and stipulate as follows:

1. At the request of Defendants, the Court ordered Mr. Ibrahim to provide information regarding a King County Superior Court judgment entered against Washington Department of Social Health and Services on his behalf in 2023 in Cause No. 21-1-06662 SEA. *See* Dkt. No. 63 at 4-7; Dkt. No. 65.

STIPULATED MOTION AND ORDER FOR  
RELIEF FROM A DEADLINE (2:23-  
cv-01755-BHS-TLF)

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1           2.       The Court entered its Order on February 26, 2025, and ordered Mr. Ibrahim to  
2 respond by March 21, 2025. Dkt. No. 65.

3           3.       Under LCR 7(j), a motion for relief from a deadline “should, whenever possible, be  
4 filed sufficiently in advance of the deadline to allow the court to rule on the motion prior to the  
5 deadline.” But “such motions are disfavored,” and LCR 7(j) instead encourages “the parties to meet  
6 and confer to file a stipulation and proposed order.” *Taber v. Cascade Designs, Inc.*, No. 2:20-CV-  
7 01633-TL, 2022 WL 2872521, at \*6 (W.D. Wash. July 21, 2022) (citing LCR 7(j)).

8           4.       Mr. Ibrahim’s pro bono counsel continues to investigate the circumstances and  
9 gather the facts surrounding the judgment at-issue so Mr. Ibrahim may provide the Court with the  
10 full context of the judgment. *See* Declaration of Nicholas Valera in support of Stipulated Motion  
11 For Relief From a Deadline. Mr. Ibrahim’s incarceration, the related obstacles to attorney-client  
12 communications, as well as his limited ability to assist, make Mr. Ibrahim’s preparation of his  
13 response to the Court’s Order especially time intensive. *See id.*

14           5.       Mr. Ibrahim’s counsel has conferred with Defendants’ counsel and the parties agree  
15 that a modest extension is appropriate for Mr. Ibrahim to respond to the Court’s Order.

16           6.       For these reasons, Mr. Ibrahim respectfully requests for the Court to grant his  
17 stipulated motion to extend the deadline for his response to the Court’s Order from March 21, 2025,  
18 to March 28, 2025.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 14th day of March, 2025.

DAVIS WRIGHT TREMAINE LLP

LEESA MANION (she/her)  
King County Prosecuting Attorney

By: s/ Nicholas A. Valera

By: s/ Santiago Viola Villanueva

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*Attorneys for Plaintiff*

*Attorney for Defendants*

### ORDER

Pursuant to stipulation, Plaintiff Adan Yusuf's request for an extension to respond to the Court's Order, Dkt. No. 65, is extended from March 21, 2025, to March 28, 2025. IT IS SO ORDERED.

DATED this 14th day of March, 2025.



The Honorable Benjamin H. Settle  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of each filing to all counsel of record.

DATED this 14th day of March, 2025.

By: s/Nicholas A. Valera  
Nicholas A. Valera, WSBA #54220